

1 Hon. Karen A. Overstreet
2 Chapter 7
3
4
5
6

7
8
9
10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON AT SEATTLE
12
13

14 IN RE:
15 ASAP CORPORATION,
16 Debtor.
17

18 NO. 10-23233
19 MOTION AND DECLARATION FOR
20 ORDER FOR RULE 2004
21 EXAMINATION OF GREENPOINT
22 TECHNOLOGIES, INC.
23

24 DENNIS LEE BURMAN, Chapter 7 Trustee, through his undersigned attorney, moves this
25 Court for an Order compelling the examination of GREENPOINT TECHNOLOGIES, INC., through
1 officer SEAN KOOLEY, regarding the acts, conduct, property, liabilities, and financial condition of the
2 debtor, and any other matter which may affect the administration of the debtor's estate.

3 This motion is based upon the annexed Declaration of Alan J. Wenokur, F. R. Bankr. P. 2004,
4 and the files and records herein.

5 DATED this 1st day of April, 2011.

6 */s/ Alan J. Wenokur*
7

8 Alan J. Wenokur, WSBA # 13679
9 Attorney for Trustee
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MOTION AND DECLARATION FOR RULE 2004
EXAMINATION - Page 1 of 2

ALAN J. WENOKUR
ATTORNEY AT LAW
600 STEWART STREET, SUITE 1300
SEATTLE, WASHINGTON 98101
(206) 682-6224
FAX: (206) 624-2631

1

DECLARATION

2

ALAN J. WENOKUR declares as follows:

3

I am the attorney for the Chapter 7 Trustee in this case. I make this statement from my personal knowledge and I am competent to testify.

5

The Trustee has separately submitted an application for the Rule 2004 examination of Greenpoint Products and Services, Inc., through its officer Sean Kooley. Mr. Kooley is also the vice president of Greenpoint Technologies, Inc., which is understood to be the parent company of Greenpoint Products and Services, Inc. The Trustee's inquiry regarding the transfer of assets between the Debtor and Greenpoint Products and Services may extend to questioning of the parent company. In addition, Greenpoint Technologies has filed a proof of claim in this case for \$678,000 that is being reviewed by the Trustee.

12

The Trustee thus desires to get full and complete information from both Greenpoint entities through a formal proceeding. To the extent a separate order for examination may be necessary in order to permit inquiry of Greenpoint Technologies, the Trustee is submitting this application. The Trustee intends to conduct a single examination of both companies, through Mr. Kooley, unless agreed otherwise with the companies.

17

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

19

Dated April 1, 2011, in Seattle, Washington.

20

/s/ Alan J. Wenokur

21

Alan J. Wenokur

22

23

24

25

MOTION AND DECLARATION FOR RULE 2004
EXAMINATION - Page 2 of 2

ALAN J. WENOKUR

ATTORNEY AT LAW

600 STEWART STREET, SUITE 1300

SEATTLE, WASHINGTON 98101

(206) 682-6224

FAX: (206) 624-2631